



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**FILED**

04-23-07

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Order Instituting Rulemaking Into Implementation of  
Federal Communications Commission Report and Order  
04-87, as it Affects the Universal Telephone Service  
Program.

R.04-12-001  
(Filed December 2, 2004)

OPENING COMMENTS OF AT&T CALIFORNIA (U 1001 C)  
ON PROPOSED DECISION

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April 23, 2007

Pursuant to Rule 14 of the California Public Utilities Commission's Rules of Practice and Procedure, AT&T California hereby submits its opening comments on the Proposed Decision ("PD") issued April 3, 2007 in this proceeding.

## **I. INTRODUCTION**

The PD takes many positive steps toward addressing the problems that have beset the LifeLine process since the implementation of the new process in 2006. As discussed below, the PD fails to address four key changes that should be implemented, which would significantly improve the customer's experience with the LifeLine Program. Additionally, the PD states that the decision will be effective immediately upon approval. This is not a realistic timeframe for carriers to implement the changes required. AT&T California also requests that the PD be clarified to insure coordination of the timing of verification denial notices sent to customers and service providers when customers are removed from the LifeLine program in the verification process.

## **II. THE PD SHOULD REQUIRE THAT SOLIX USE FIRST CLASS POSTAGE.**

The PD acknowledges that delays in the mail cause customers to receive LifeLine forms in 8 to 14 days and that many customers have been disqualified from LifeLine because they returned their form late.<sup>1</sup> The PD states that "[s]ince standard mail delivery is not guaranteed, the Commission has no guarantee that LifeLine forms and documents are delivered to addressees nor that undelivered mail is returned to Solix."<sup>2</sup> The Commission also admits that:

With standard mail, there is no guaranteed delivery, nor return to sender. This is not satisfactory in a program based on time-sensitive mailings. While we recognize there is no specific provision in the current contract requiring the use of first class mail, we order the Communications Division to explore mechanisms for faster guaranteed LifeLine mail delivery and incorporate those findings in any future amendment to the current contract, or future RFP.<sup>3</sup>

To use the Commission's own words, it is not satisfactory to send out the LifeLine forms without first class postage. This provision should have been included in the

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<sup>1</sup> PD, pp. 9-10.

<sup>2</sup> *Id.* at 9.

<sup>3</sup> *Id.* at 15.

recently approved contract amendment. Since this apparently is no longer feasible, the Commission should order an additional amendment to require Solix to use first class postage.

Not only is standard mail unsatisfactory for sending LifeLine mailings, those mailings may not even meet the United States Postal Service requirements for standard mail. In the Commission staff report, Staff stated that standard mail cannot be used for sending personal correspondence, handwritten or typewritten letters, bills and statements of accounts.<sup>4</sup> Additionally, according to the United States Postal Service website,<sup>5</sup> standard mail can be used for sending: printed matter, flyers, circulars, advertising, newsletters, bulletins, catalogs and small parcels. It also states that some things must be sent first class mail, including handwritten or typewritten material, bills, statements of account or invoices, credit cards, personal correspondence, personalized business correspondence and all matter sealed or otherwise closed against inspection.<sup>6</sup> AT&T California believes that the customer specific letters, and certification and verification forms constitute “personalized business correspondence.” Based on the United States Postal Service definitions, these critical LifeLine documents do not appear to satisfy the requirements for standard mail. First class mail must be used.

We believe that the issue of postage is the single most important issue to be addressed. First class postage ensures that customer mailings are delivered in the shortest time possible and provides for free forwarding and return to sender. The PD should be revised to make first class postage a requirement for Solix. LifeLine customers deserve that every effort be made to provide them first class service, especially since their response is of a time sensitive nature.

### **III. THE VERIFICATION PROCESS SHOULD NOT BE REINSTATED CONCURRENT WITH THE APPROVAL OF THE PD.**

The PD reinstates the verification process that has been suspended for six months due to the problems encountered with the process last year. In Ordering Paragraph 9, the PD states:

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<sup>4</sup> *Id.* at 29.

<sup>5</sup> See <<http://www.usps.com/send/waystosendmail/senditwithintheus/standardmail.htm>>.

<sup>6</sup> See <<http://www.usps.com/businessmail101/classes/firstClass.htm>>.

We lift the suspension of the following sections of General Order 153 which were suspended in the November 1, 2006 assigned Commissioner Ruling, as modified by Decision 06-11-017: Section 4.5, including Appendix C; 5.5; those portions of 6.3 and 6.4 as they relate to the annual verification process; 8.1.3 as it relates to customers who have not responded to the annual verification notice or returned it late; Appendix C; and the portion of Appendix E titled “Existing ULTS Customers (Verification).” Those sections of General Order 153 shall be reinstated immediately, as of the date of this order.<sup>7</sup>

The Commission should extend the current suspension of the verification process until first class postage has been implemented because to do otherwise invites further customer problems. There are many other improvements that will only occur with the approval of the PD, but many of these changes will only benefit customers who actually receive their forms. For example, these changes include modifications of G.O.153 to extend the period of time for customers to return both the certification and verification forms and additional reminder notices sent to customers. Additional changes will also be implemented in concurrence with the approval of the PD; these include envelope, form, and letter changes. The Commission should approve these other changes first and allow time to implement these process improvement changes, and then only after the first class postage issue has been resolved, should the Commission reinstitute the verification process for LifeLine customers.

To reinstitute the verification process concurrent with implementation of the other improvements only invites more problems for those customers that never receive the forms and letters. For example, Staff has recommended an increase in the number of days customers have to return both certification and verification forms. This also includes additional contacts with different types of reminder notices to customers. All of these recommendations are good, and AT&T California supports them. Such changes, however, only help those customers that actually receive the forms and letters. AT&T California’s experience is that a significant number of our customers tell us that they have never received the form. Therefore, just expanding the timeframe and sending additional reminder notices is not going to assist those customers who have never received the forms.

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<sup>7</sup> *Id.* at 25-26.

Alternatively, if the Commission believes there is a compelling reason which mandates that the verification process be reinstated immediately, then we suggest that the Commission do so on a limited basis. The Commission should first reinstate the process for 10% of the customers selected on a random basis, and then analyze the results for these customers before reinstating the program for the other 90% of the customers. This would limit the impact of any problems that customers encounter, and allow time to make further improvements before reinstating the process for the entire population of verification customers.

**IV. THE PD SHOULD BE REVISED TO REQUIRE SOLIX TO PROCESS LATE FORMS AS LONG AS THE FORMS ARE COMPLETE.**

The PD discusses at length the issue of customer disqualification that has happened due to delays in sending out the forms and customers' failure to return forms in a timely manner. To remedy this problem, the PD revises G.O.153 to allow extra time for certification and verification forms to be returned. We see no reason to disqualify customers based on arbitrary deadlines for when forms must be received. Accordingly, the PD should be revised to provide that Solix should process any complete form it receives regardless of whether the deadline has past. In this scenario, Solix would have previously disqualified the customer for non-response, and the service provider would have removed the customer from LifeLine. AT&T California proposes that if the customer has already been removed from the program, then Solix should be allowed to process completed forms received subsequent to the deadline and allow the customers to be reinstated effective when Solix processes the form, and allow LifeLine discounts from this date forward. The customer would be reinstated, but would not receive the Lifeline discount retroactively for the period when they were not in the program. A conversion charge should not be imposed in this situation, where the customer is reinstated to the LifeLine Program. See Attachment A for AT&T California's proposal for handling late forms for these situations.

**V. THE PD SHOULD BE REVISED TO GIVE CUSTOMERS AN ADDITIONAL OPPORTUNITY TO INITIALLY CERTIFY IN THE PROGRAM.**

The PD recommends increasing the number of days from 30 to 44 days for customers to return their completed certification forms. This proposal, however, does not allow

for additional forms to be sent to the customer; it just requires sending additional reminder notices. Given the delays in customers receiving forms, and the fact that in many cases, customers never receive certification forms due to using standard mail, AT&T California proposes that customers be sent a second form before being removed from LifeLine service due to a non-response. This proposed change would allow the customer another chance to return the certification forms and not be disqualified from LifeLine for reasons beyond their control. In the March 8, 2007 public meeting, AT&T California shared a proposal that would allow customers going through the certification process to have an opportunity to receive multiple forms. AT&T California believes implementing this proposal would mostly entail process changes on the part of carriers and only very modest changes in Solix processes. We do not expect an amendment to the Solix contract would be needed to allow for these changes. This process could be considered an interim solution for the certification process until the first class mail issue is resolved, or could be continued after the postage issue is resolved. See Attachment B for AT&T California's proposal regarding this issue.

**VI. THE PD SHOULD BE REVISED TO INCORPORATE TIME FOR IMPLEMENTATION OF THE VARIOUS NEW REQUIREMENTS.**

The PD should be revised to incorporate a reasonable timeframe for the parties to implement the new requirements. The PD proposes many changes to the program that affect Solix and service providers. Many service providers have been involved in the voluntary Commission staff working group sessions and are aware of the proposed changes. Many other service providers, however, have not participated in these sessions so they would need lead time to produce the required notice to existing LifeLine customers as an example. Additionally, all service providers, whether participating in the working group sessions or not, will need time to implement the confirmation notice to new LifeLine customers.

Any additional changes identified in the final decision will need to be incorporated in service provider's methods and procedures and communications with customers. All carriers will necessarily require time to implement these changes and new methods and procedures. AT&T California recommends that these requirements in the PD become effective

60 days from the date of the decision for all the proposed changes, with the exception of the reinstatement of the verification process. That process should only be reinstated once the first class postage issue is resolved, as we described in section II.

**VII. THE PD SHOULD BE CLARIFIED TO ENSURE THAT THE TIMING OF THE CUSTOMER'S DISQUALIFICATION AND NOTICE TO THE CARRIERS OF DISQUALIFICATION BE THE ANNIVERSARY DATE.**

The PD should be clarified to ensure that the coordination of the timing of verification disqualification decision notices sent from Solix to both service providers and customers will occur on the customer's anniversary date. Specifically, the changes shown in Attachment 1 to Staff Report, p. 49, should include the anniversary date. Prior to the suspension of the verification process, customers and service providers were notified of a customer's pending disqualification effective at the customer's anniversary date. However, in most cases, this notice was provided several weeks prior to the customer's actual anniversary date. This time period was known as the "dead zone" in which Solix made a decision, but the customer could not do anything to prevent the pending disqualification.<sup>8</sup>

The "dead zone" required AT&T California to hold in its system the disqualification decision until the effective date (anniversary date). This timing issue caused significant problems for AT&T California when customers called in to put themselves back on LifeLine in the "dead zone" even though customers were technically still on the program until their anniversary date. This caused significant work for our service representatives and back office support staff and coordination with our IT staff to handle the customer's request to reenroll in the program. AT&T California seeks clarification that the new verification disqualification process eliminates the "dead zone" and customers and service providers will be informed of the customer's disqualification on the effective date (anniversary date) of disqualification. This would eliminate customer and service representative confusion, as well as

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<sup>8</sup> As the Commission recognized in D.06-11-017, when it adopted the Assigned Commissioner's Ruling, which stated: "Currently, if a customer fails to return the verification form within 30 days, the customer has no means of correcting that oversight. The customer is in 'limbo,' as the customer is scheduled to be removed from the Lifeline program on the 60<sup>th</sup> day. Days 31 to 60 are a 'dead zone' that causes needless work for CPUC staff and carriers and distress for customers." *Assigned Commissioner's Ruling Temporarily Suspending Portions of General Order 153*, pp. 3-4 (Nov. 1, 2006).

eliminating the need for service providers to hold a disqualification decision for periods of time, but instead service providers would process disqualifications when received from Solix. This process would then mirror the more streamlined certification process.

#### **VIII. CONCLUSION**

AT&T California's proposed changes will improve the LifeLine customers' experience. In conclusion, AT&T California recommends the following: First, the Commission should revise the PD to make first class postage a requirement for Solix. Second, the Commission should extend the current suspension of the verification process until first class postage has been implemented. Third, the Commission should direct Solix to process late, but completed forms. Fourth, the Commission should allow customers going through the certification process the opportunity to receive additional forms before being disqualified for a non-response. Additionally, a 60-day extension period for implementation should be adopted and finally, the "dead zone" period should be eliminated by setting a date for sending verification denial notices to both the customers and the carrier on the anniversary date.

Dated at San Francisco, California, this 23<sup>rd</sup> day of April 2007.

Respectfully submitted,



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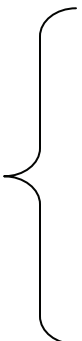

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**AT&T California  
California Lifeline  
Proposal for Handling Certification Customers Submitting Late Forms**

|                      |  |
|----------------------|--|
| Current Process      |  <ol style="list-style-type: none"> <li>1. Customer contacts service provider and enrolls in Lifeline</li> <li>2. Service provider sends feed to Solix to add customer to Lifeline</li> <li>3. Solix send Certification form to customer with due date in 30 days.</li> <li>4. Solix determines customer is qualified or disqualified.</li> <li>5. Solix sends service provider a feed with decision of qualified or disqualified.</li> <li>6. If Solix decision is disqualified, service provider removes the customer from Lifeline, back bills the customer for all Lifeline discounts received and changes them to a non-Lifeline class of service.</li> <li>7. If customer submits forms late, Solix scans documents but does not process.</li> </ol>  |
| Proposed New Process |  <ol style="list-style-type: none"> <li>7) If customer submits forms late, Solix scans and processes documents.</li> <li>8) Solix determines customer is qualified or disqualified.</li> <li>9) If Solix decision is disqualified, Solix sends letter to customer informing them that they were previously denied for non-response. Subsequent to that decision, their form was received late but it was processed. However, it has been determined they are ineligible because XX (specify reason).</li> <li>10) If Solix decision is disqualified, no data feed to service provider to remove customer from Lifeline needed as that was done previously (step #6 above).</li> <li>11) If Solix decision is qualified, Solix sends letter to customer informing them that they were previous denied for non-response. Subsequent to that decision, their form was received late but it was processed. It has been determined they are eligible for Lifeline. However, because their form was received after the due date, their Lifeline discount will only be reinstated back to the date in which the form was received by the Certifying Agent.</li> <li>12) If Solix decision is qualified, Solix to send a data feed to service provider to reinstate customer in Lifeline effective a specific date.</li> </ol> |

**PROS:**

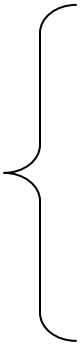
1. Improved Customer Experience
  - Customers that turn in their completed documents late have their documents reviewed. If determined eligible, they are placed back on the program without having to go through the certification process all over again.
2. Decrease in customer inquiries to service providers
3. Decrease in customer appeals to CPUC CAB

**CONS:**


1. Customers may not like being penalized for sending their form in late and having their Lifeline discount reinstated to coincide with the date in which the late form was received by the Certifying Agent.

**AT&T California  
California Lifeline  
Proposal for Handling Customers Having Difficulty  
Certifying Their Eligibility**

Current  
Process

- 
1. Customer contacts service provider and enrolls in Lifeline
  2. Service provider sends feed to Solix to add customer to Lifeline
  3. Solix send Certification form to customer with due date in 30 days.
  4. Solix determines customer is qualified or disqualified.
  5. Solix sends service provider a feed with decision of qualified or disqualified.
  6. If Solix decision is disqualified, service provider removes the customer from Lifeline, back bills the customer for all Lifeline discounts received and changes them to a non-Lifeline class of service.

Proposed  
New  
Process

- 
6. If Solix decision is disqualified (for specific reasons, for example non-response)
  7. Service provider automatically sends a new request back to Solix to add the customer to Lifeline without removing the customer from Lifeline.
  8. Solix repeats steps 3-5
  9. Service provider repeats steps 6&7 for 2 attempts
  10. Upon the second attempt and Solix determines the customer is not qualified the service provider removes the customer from the program and back bills the customer for all Lifeline discounts received
  11. Service provider changes the customer to a non-Lifeline class of service.

**PROS:**

1. Improved Customer Experience
  - Customers remains on Lifeline without going on and off the program
  - Customers do not incur additional conversion charges by re-enrolling
  - Customers continues to received Lifeline benefits
2. Decrease in customer inquires to service providers
3. Decrease in customer appeals to CPUC CAB

**CONS:**

1. If customers are eventually determined disqualified, customers will be back billed for several months of Lifeline discounts they were not eligible to receive. Customer bills will be higher.

## **Appendix: AT&T California's Recommended Changes to Proposed Findings of Fact and Conclusions of Law**

### **Findings of Fact**

1. Many LifeLine recipients complained that they received their certification or verification notices too late to respond.
2. With standard mail, there is no guaranteed delivery, nor return to sender.
3. Standard mail, standing alone, is not satisfactory in a program based on time-sensitive, short-deadline mailings. First class postage should be used by Solix for all letters and forms.
4. The proposed modifications to Appendix E of GO 153 are a key element in improving the response rates for both certification and verification.
5. The low response rate is multi-faceted, so the resolution will be multi-faceted as well.
6. Staff needs to be informed of system problems – especially any that impact LifeLine customers – within 48 hours of when they are discovered.
7. Staff has identified problems that will require solutions beyond those that can be implemented in the short term.
8. The carriers and Solix will need 60 days to implement the changes adopted here.

### **Conclusions of Law**

1. In light of the problems with standard mail, it is critical that customers have additional time to respond.
2. In order to respond quickly to problems, staff should make use of the resolution process to present further changes to the GO for Commission approval.
3. Since there is insufficient time for the customer to respond, the timeline for verification should be revised by issuing a “soft” denial on the 45<sup>th</sup> day, instead of the outright denial in the current process.
4. The additional reminders and notifications included in the contract amendment should encourage LifeLine customers to complete and return the required forms.
5. Staff should have the authority to interpret what specific documents can be included under the catchall phrase: “Other official document,” with the caveat that the document in question should be one the purpose of which is to verify or establish income.

## **Appendix: AT&T California's Recommended Changes to Proposed Findings of Fact and Conclusions of Law**

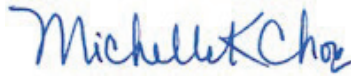
6. Carriers should send the reminder materials to new LifeLine customers.
7. Solix should identify and rectify problems impacting LifeLine customers as quickly as possible.
8. The contract modification described in the Staff Report should help to increase the response rates.
9. The steps outlined by staff under their short-term strategies will help to increase response rates.
10. The suspension of those portions of GO 153 suspended in the November 1, 2006 ACR, as modified by D.06-11-017, should not be lifted until Solix has implemented first class postage.
11. Some long-term strategies may require a more formal review than that of the resolution process.
12. Commission staff should ensure that Solix is in compliance with its contract and any subsequent amendments.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **OPENING  
COMMENTS OF AT&T CALIFORNIA (U 1001 C) ON PROPOSED DECISION** in  
**R.04-12-001** by electronic mail and/or by hand-delivery to the person in the official Service List.

Executed this 23<sup>rd</sup> day of April 2007, at San Francisco, California.

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Michelle K. Choo

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

**Proceeding: R0412001 - CPUC-ILECS, CLECS -**  
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**Last changed: April 19, 2007**

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